

Green Power Partnership Request for Comments on EPA's Proposed Program Requirement Change

Green Power Partnership
U.S. Environmental Protection Agency
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Proposed Revision to Green Power Partnership Program Requirements

TO: EPA Green Power Partners and Interested Stakeholders

FROM: Blaine Collison (collison.blaine@epa.gov, 202-343-9139)

EPA Green Power Partnership

DATE: September 25, 2006

RE: Draft Proposed Update to Green Power Partnership Program Requirements

BACKGROUND

The U.S. Environmental Protection Agency (EPA) established the Green Power Partnership to encourage the voluntary use of green power to reduce the risk of global climate change and the environmental impacts associated with conventional electricity use.

The objectives of the Green Power Partnership include the following:

- Expand awareness of green power by providing objective information and public recognition for organizations purchasing renewable energy;
- Lower transaction costs for organizations interested in switching to green power;
- Reduce greenhouse gas emissions associated with electricity use through the development of new renewable generating resources brought on-line to serve demand created by voluntary green power markets.

The Green Power Partnership has grown to include more than 600 Partners, collectively purchasing more than five billion kilowatt-hours of green power annually.

In order to keep program requirements consistent with our objectives, we regularly review market developments and consider program changes accordingly. The following pages contain details regarding the proposed update to Partnership requirements. Objectives reflected in the proposed update include the following:

- Increase program cost-effectiveness by redirecting program costs associated with program administration costs for partners purchasing less than 100 MWh to other program efforts that will yield greater greenhouse gas reductions.
- Focus support activities on organizations best positioned to leverage publicity from their green power commitment, thereby further raising public awareness of the overall benefits and availability of green power.

• Strengthen program integrity and stakeholder relationships by making changes that are easy to communicate, understand and implement.

We invite comments on these draft proposed changes, which would go into effect starting January 1, 2007. These changes will be implemented alongside the previously announced updates. See the Green Power Partnership website for details of those changes:

http://www.epa.gov/greenpower/pdf/gpp partnership reqs 5-06.pdf

Please email any comments to me (collison.blaine@epa.gov) by COB on Monday, October 16, 2006. Thank you.

PROPOSED CHANGES TO GREEN POWER PARTNERSHIP REQUIREMENTS

The Green Power Partnership proposes to impose a minimum required purchase level for Partnership eligibility. All partners must purchase a minimum of 100 MWh of green power annually – regardless of total electricity usage - to be eligible for the Partnership. Current partners that are purchasing less than 100 MWh of green power annually will have until January 1, 2008 to increase their purchase to meet the new requirement. Partners are permitted to purchase green power in excess of their total electricity usage. On January 1, 2008, partners not meeting the 100 MWh minimum purchase requirement will be retired from the Partnership.

Minimum Purchase Levels

| Annual Electricity Usage | Approved 1/1/07 Revised Minimum Purchase* | Proposed Enhanced Minimum Purchase* |
|--------------------------|---|--|
| > 100,001 MWh | 2% | 2% |
| 10,001-100,000 MWh | 3% | 3% |
| 1,001 - 10,000 MWh | 6% | 6% with a 100 MWh minimum purchase |
| 100 – 1,000 MWh | 4.00 / | 10% with a 100 |
| < 100 MWh | 10% | MWh minimum purchase |

^{*} For each purchase level, the minimum purchase to qualify must be greater than the highest purchase quantity of the next lower purchase requirement. The net effect of this requirement is illustrated in the chart below.

Effective Minimum Purchase Levels

| Annual Electricity Usage | 100 – 1,000 MWh | 1,001-10,000 MWh | 10,001 - 100,000 MWh | > 100,001 MWh |
|--------------------------|-----------------|------------------|----------------------|---------------|
| Minimum Purchase % | 10% | 6% | 3% | 2% |
| Minimum Purchase | 100 | 100 MWh - 600 | 600 MWh - 3,000 | 3,000 MWh - |
| Range (MWh) | | MWh | MWh | |
| Annual Usage | n/a | 1,660 MWh | 20,001 MWh | 151,000 MWh |
| Threshold At Which | | | | |
| Next-Lower Min. Is | | | | |
| Exceeded | | | | |

RATIONALE FOR PROPOSED UPDATE: These changes will focus the Partnership's limited resources on larger electricity users because these users' green power purchases result in larger reductions in greenhouse gas emissions and will rapidly expand the market for new renewable resources.